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*Attorneys for Defendants*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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EXPRESS FREIGHT SYSTEMS INC.,

*Plaintiff,*

- against -

YMB ENTERPRISES INC., JOEL  
MENDLOVIC, JOHN DOES 1-10 and  
ABC CORPS. 1-10 (said names being  
fictitious),

*Defendants.*

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**Case: 2:19-cv-12001-SDW-LDW**

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**NOTICE OF MOTION**

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**PLEASE TAKE NOTICE** upon the annexed Brief in Support of Defendants' Motion, attorney affirmation affirmed by the undersigned, affirmation by Joel Mendlovic, and a proposed order, and the full record of this case to date, counsel Lawrence Katz, Esq., of Law Offices of Lawrence Katz, moves on behalf of YMB ENTERPRISES INC. and JOEL MENDLOVIC before the Honorable Judge Susan D. Wigenton at the United States District Court for New Jersey, room 5C of the Martin Luther King Building at 50 Walnut Street, Newark, NJ 07101 for an order granting:

1. Dismissal of the complaint pursuant to FRCP 12(b)(1)-(2) for the absence of jurisdiction;
2. Dismissal of the complaint pursuant to FRCP 12(b) (5) for the failure to serve;
3. For such other and further relief as the Court deems appropriate under the circumstances in favor of this motion, including granting alternative relief pursuant to FRCP to 12(b)(3) to transfer this case to the venue where Defendants are domiciled (either the Eastern District of New York or to the Supreme Court of New York, County of Kings).

Dated: Valley Stream, NY  
July 26, 2019

Law Offices of Lawrence Katz

/ s / Lawrence Katz

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By: Lawrence Katz

70 East Sunrise Highway, Suite 500  
Valley Stream, NY 11581

*Attorneys for Defendants*

Via ECF to all Counsel of Record